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August 26, 2002

**By Hand Delivery**

Marlene Dortch, Secretary  
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445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

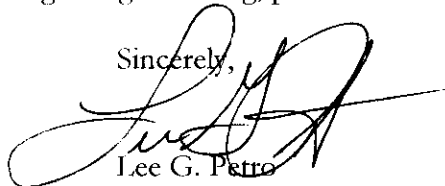
**RE:** Amendment of Section 73.202(b), FM Table of Allotments  
MM Docket No. 02-23, RM-10359, RM-10434  
Hall Communications, Inc.

Dear Ms. Dortch:

Transmitted herewith is an original and four copies of a "Response of Hall Communications, Inc." filed on behalf of Hall Communications, Inc. in the above-referenced proceeding.

Should there be any questions regarding this filing, please contact undersigned counsel.

Sincerely,



Lee G. Petro

Counsel to Hall Communications, Inc.

Enclosures

cc (w/enc): David G. O'Neill, Esquire  
Counsel to Great Northern Radio, LLC  
Counsel to Family Broadcasting, Inc.

Barry A. Friedman, Esquire  
Counsel to Montpelier Broadcasting, Inc.

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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AUG 26 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In re:	}	
	}	
Amendment of Section 73.202(b)	}	MM Docket No. 02-23
Table of Allotments,	}	RM-10359
FM Broadcast Stations.	}	RM-10434
(Keeseville, New York; Hartford and	}	
White River Junction, Vermont)	}	

To: Chief, Media Bureau

**RESPONSE OF HALL COMMUNICATIONS, INC.  
TO REQUEST FOR EXTENSION OF TIME**

Hall Communications, Inc. ("Hall"), by and through its attorneys, hereby submits this Response to the Request for Extension of Time (the "Request") submitted by Great Northern Radio, LLC and Family Broadcasting, Inc. (collectively, the "Petitioners") on August 20, 2002 in the above-referenced proceeding.<sup>1</sup>

Rather than just filing a request for extension of time, to which Hall has no objection, the Request includes yet another assault on the supplementary information provided by Hall. However, as demonstrated in Hall's Opposition filed on August 8, 2002, the Counterproposal, as filed on April 1, 2002, was substantially complete and technically correct as filed. The supplemental information that was provided did not change the Counterproposal; it only addressed various points raised by the Petitioners' pleadings.

In its filings, Hall has irrefutably demonstrated the following:

1. The facilities specified in the Counterproposal will provide Keeseville with the requisite 70 dBu signal to the entire community as demonstrated by the FCC's own standard prediction method;

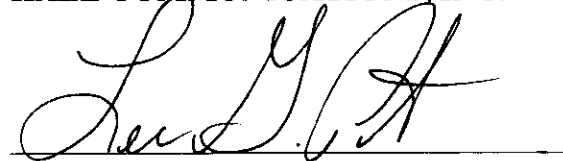
<sup>1</sup> The Petitioners, in their Petition for Rulemaking which initiated this proceeding, proposed the reallocation of (i) Channel 282C3 from Hartford, Vermont to Keeseville, New York and (ii) Channel 237A from White River Junction, Vermont to Hartford. In contrast, in its Counterproposal filed on April 1, 2002, Hall simply proposed the allotment of Channel 282A at Keeseville, New York, thus preserving the existing allotments at Hartford and White River Junction (the "Counterproposal").

2. With a tower height of only 30 feet, Keeseville will receive the requisite 70 dBu signal as demonstrated by the Longley-Rice methodology;
3. There is sufficient evidence to demonstrate that the placement of a tower of reasonable height within the Adirondack State Park is not prohibited;
4. As proposed in the Counterproposal, Hall's proposal will provide a new, interference-free broadcast service to a greater number of people than the reshuffling of existing services proposed by the Petitioners;
5. As demonstrated in the supplementary information, a maximized Class A facility at Keeseville will provide a new FM broadcast service to 145,534 people, whereas the Petitioners C3 proposal will only provide a net service gain to 78,684 people;
6. Hall's Counterproposal will not eliminate any service to the public, in direct contrast to the Petitioners' proposal, that would remove an FM service from 106,130 people; and
7. Hall's Counterproposal would result in the Keeseville allotment being open to the public at a future auction, rather than solely serving the corporate interests of the Petitioners.

Thus it is clear that the Counterproposal will result in a preferential arrangement of the FM Table of Allotments. Hall established this fact in its Counterproposal, and should not be attacked again -- in a procedural motion -- for merely providing supplementary information in responsive to the Petitioners' pleadings.

Respectfully submitted,

**HALL COMMUNICATIONS, INC.**



Susan A. Marshall  
Lee G. Petro  
Its Attorneys

FLETCHER, HEALD & HILDRETH, P.L.C.  
1300 North 17th Street, 11<sup>th</sup> Floor  
Arlington, Virginia 22209  
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August 26, 2002

CERTIFICATE OF SERVICE

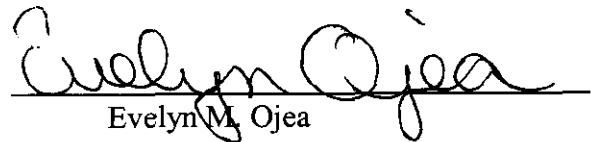
I, Evelyn M. Ojea, a Secretary with the law firm of Fletcher, Heald & Hildreth, certify that I have this 26<sup>th</sup> day of August, 2002, caused to be sent by first-class U.S. mail, postage-prepaid, or Hand Delivery, as indicated, a copy of the foregoing "Response" the following:

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Victoria McCauley\*  
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By:

  
Evelyn M. Ojea

\* By Hand Delivery